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Filed 08/15/2007 Page 1 of 2 Lovells LLP 590 Madison Avenue New York NY 10022

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August 14, 2007

Our ref NYMJG2/121368.1 Matter ref W1988/00022

The Honorable Judge Richard M. Berman United States District Court for the Southern District of New York 40 Centre Street New York, NY 10007



BY FEDEX

ZIM INTEGRATED SHIPPING SERVS., LTD. V. BELCO RES., INC. ET AL, CASE NO. 07-CV-RE: 05861

Dear Judge Berman:

We represent defendant Sinochem Jiangsu Corporation ("Sinochem") in the above-captioned matter. We write to respectfully request that the deadline for Sinochem to enter a response or otherwise move with regard to the complaint in the above-captioned matter be extended to October 1, 2007. Although the docket currently reflects July 26, 2007 as the date upon which an answer is due, Sinochem and the plaintiff, Zim Integrated Shipping Services, Ltd., have already agreed to extend this deadline until September 1, 2007, and the plaintiff has advised us that they would not oppose this request. This request is the first such request to the Court. Our firm is in the process of obtaining facts relating to the complaint from the People's Republic of China ("China") including facts concerning the related criminal investigation ongoing in China, and this extension will serve to facilitate this proce

Respectfully submitted Edward T. Schorn

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August 14, 2007

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